



NATIONAL INTELLIGENCE COUNCIL

JULY 2024

NIC-SG-2024-20319-A

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 1 of 11

Key Takeaways

Scope Note: *This standalone graphic responds to the requirement in Public Law 117-103 that “The Director of National Intelligence, acting through the National Intelligence Council, shall develop a lexicon of common terms (and corresponding definitions for such terms) for concepts associated with gray zone activities.” This lexicon provides a common reference guide of country-agnostic terms and is intended to standardize terminology used by IC components, particularly analytic components. Terms contained in this lexicon do not supplant US authorities, policies, operations, or other actions, and they do not supersede any US legal definitions, for which individual agencies should consult their respective Offices of General Counsel.*

The IC defines the gray zone as a realm of international relations between peaceful interstate diplomacy, economic activity, and people-to-people contact on one end of the spectrum and armed conflict on the other, and gray zone activities as coercive or subversive actions to achieve objectives at the expense of others in contravention or in the absence of international norms. We assess that gray zone activities and campaigns are likely to increase in the coming years and become a dominant feature of great power competition and international relations more broadly because of eroding or nonexistent norms; emerging, evolving, and expanding domains; and perceptions of their comparative advantages.

- The IC previously has not agreed upon definitions for the gray zone or for all associated concepts. To develop this lexicon, the NIC reviewed a range of academic research and all-source intelligence, consulted with leading external researchers, and led structured analytic exercises with IC experts to establish a baseline and scope.
- This lexicon is intended to add precision to IC analysis and provide a common foundation for debate, analysis, and messaging. It prioritizes clarity, consistency, and universality but does not cover all terms associated with states’ and non-state actors’ international behavior, including technical terms or those commonly understood. Unless there are substantive divergences, this lexicon complements other US Government lexicons. The inclusion of a term does not indicate that the IC necessarily classifies it as a gray zone activity, a determination dependent on circumstances; some terms are included for context.

This standalone graphic was prepared by the National Intelligence Council (NIC) under the auspices of the National Intelligence Officers for China, Russia/Eurasia, Near East, East Asia, Counterintelligence/Foreign Malign Influence, Cyber, Economics, Military Issues, Space, Terrorism and Transnational Crime, Weapons of Mass Destruction, and the Strategic Futures Group. It was drafted by the National Intelligence Council and coordinated with CIA, DHS, DIA, DOE, FBI, NGA, NSA, State/INR, and Treasury/OIA.

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 2 of 11

During the past 15 years, China, Iran, North Korea, and Russia increasingly have sought to achieve strategic objectives by concerted action against others in areas considered the “gray zone”—a term popularized in the 2010s by Western researchers. The IC assesses that in the coming years, these gray zone campaigns and activities are likely to increase and become a dominant feature of great power competition and international dynamics generally because of the combination of eroding or non-existent international norms; emerging, evolving, and expanding international domains; and authoritarian leaders’ perception of their comparative advantages and fewer risks. In particular, recent conflicts in Ukraine and the Middle East have demonstrated, particularly for revisionist foreign leaders, that gray zone campaigns can be both a complement and a viable alternative to armed conflict and diplomacy. The IC assesses that some US partners and non-state actors also are likely to employ gray zone activities. In some instances, states will employ such activities outside of discernable campaigns, further complicating both analysis and policy responses. Because of the covert nature of many gray zone activities, intelligence collection and analysis provide unique insights into actors’ intent and enable attribution.

- **Old Concept, New Name.** The use of coercive or subversive instruments of power—beyond diplomacy and in lieu of war—to achieve objectives has been a feature of statecraft since Chinese and Greek theorists described it in the fifth century BCE. During the Cold War, US diplomat and strategist George Kennan predicted that long-term competition would be characterized by “an extension of armed conflict by other means,” which he described as an enduring norm of international relations. He used “political warfare” to describe “the employment of all means at a nation’s command, short of war, to achieve its national objectives.”
- **Routine Behavior.** Kennan’s influential policy memorandum on political warfare focused on institutionalizing overt and covert US efforts to contain and weaken the USSR. Current PRC, Iranian, North Korean and Russian leaders view some of their actions now described as “gray zone” activities as routine and legitimate tools of statecraft, and publicly and privately ascribe similar behavior to the United States. PRC and Russian strategists, whose translated theories were interpreted by Western researchers in the 2010s as reflecting official gray zone doctrines, focused instead on perceived Western strategies and advocated potential counters. PRC and Russian leaders, in particular, continue to believe that Washington is threatening their states by supporting proxies, conducting provocative military and information operations, and using economic coercion, and they often consider their actions to be mimicking or countering US gray zone activities.
- **Broad but Differentiated.** Theorists and practitioners have used the term “gray zone” to describe diverse activities ranging from Iran’s targeting of US officials for assassination, to Russia’s election disinformation, and China’s militarization of artificial islands in the South China Sea. However, we consider the “gray zone” distinct from related terms such as hybrid warfare, asymmetric warfare, irregular warfare, and strategic competition.

Constructing the IC’s Definitions for the Gray Zone

The IC previously has not had an agreed-upon definition of the gray zone. Since 2015, various organizations have promulgated gray zone definitions for different purposes, informed by research from think tanks.^a Several concerns have limited the development of a consensus IC definition: US adversaries do not have a common or analogous understanding of the concept; a single definition risks oversimplifying foreign actors’ intentions, effects, and behaviors; and practitioner biases might sway determinations of what constitutes gray zone activity, raising objectivity issues.

a. See Appendix A for a survey of existing gray zone definitions from US Government and research organizations.

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 3 of 11

To construct this IC-coordinated lexicon, during the past two years, the NIC reviewed a range of academic research and all-source intelligence on the gray zone concept, consulted with leading external researchers, and led structured analytic exercises with experts from across the IC to establish an intelligence baseline and scope. The NIC noted that existing definitions of the gray zone were outwardly consistent but differed in framing. These definitions were generally vague, particularly in using undefined constituent terms such as “ordinary statecraft” to establish the gray zone’s lower threshold, and many relied on non-diagnostic characteristics to identify gray zone activities. Underlying analyses usually agreed on certain examples of PRC, Iranian, North Korean, and Russian gray zone campaigns, but also applied the term inconsistently to an array of substantively distinct activities that ranged from nuclear weapons development to intellectual property theft; one scholar noted that “the gray zone cannot mean everything if it is to mean anything.” In its review, the NIC noted that the absence of common definitions can indirectly facilitate adversaries’ gray zone campaigns and hinder effective international responses, particularly given the increasing use of intelligence as the basis for diplomatic and public messaging.

The following, IC-coordinated lexicon is intended to help add precision to IC analysis, particularly across countries, and provide a common foundation for debate, analysis, and messaging.

- **Clarity.** This lexicon provides verbal and substantive precision in both terms and definitions and avoids words that are vague, debated, or have multiple interpretations, such as routine or normal statecraft; competition; malign; and war and peace. We prioritized definitions that are comprehensive, specific, and do not rely on non-diagnostic descriptors.
- **Consistency.** Whenever analytically appropriate, the NIC maintained substantive consistency with established legal and official terminology to facilitate effective interagency and international coordination. A standard lexicon that aligns with international law and norms can support efforts to identify gray zone activities, coordinate with partners, and deter or encourage states to deescalate gray zone campaigns—reinforcing the rules-based international order.
- **Universality.** This lexicon is designed to be applicable to all countries and actors, without regard to their relationship with the United States or the motivations or perceived appropriateness of their actions. Activities that researchers and practitioners have characterized as gray zone activities—such as information operations or sabotage—have been sponsored and executed by both states and non-state actors for a variety of discernable and undiscernible purposes, requiring a universally applicable lexicon to facilitate broader analysis.

This lexicon does not attempt to cover all terms associated with states’ and non-state actors’ international behavior that may relate to the gray zone, including technical terms associated with military operations, diplomacy, international economics, or those that are commonly understood. Unless there are substantive divergences, this lexicon complements other US Government lexicons, including the “DOD Dictionary of Military and Associated Terms.” The inclusion of a term in this lexicon does not indicate that the IC necessarily classifies it as a gray zone activity. Rather, we assess that the terms defined herein are necessary to provide a common baseline and understanding of the gray zone. The IC assesses that whether certain activities are part of a gray zone campaign is circumstantial and depends in part on the actor, intended effects, and international norms. Some terms contained herein overlap and are included to provide context or contrast with related terms.

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 4 of 11

<i>italics</i>	Word has its own entry in the lexicon	▲	Term and definition substantively copied from another US Government lexicon or international law	●	Term in Public Law 117-103
----------------	---------------------------------------	---	--	---	----------------------------

GRAY ZONE DEFINITIONS

Gray Zone. A realm of international relations between peaceful interstate diplomacy, economic activity, and people-to-people contact at one end of the spectrum and *armed conflict* on the other, in which *states* and *non-state actors* use *coercive* or *subversive* means that can be violent or nonviolent to achieve their objectives at the expense of others, in contravention or the absence of *international norms*.

Gray Zone Campaign. The deliberate use of *coercive* or *subversive* instruments of power by, or on behalf of, a *state* to achieve its political or security goals at the expense of others, in ways that exceed or exploit *gaps* in *international norms* but are intended to remain below the perceived threshold for direct *armed conflict*. Gray zone campaigns are commonly characterized by a sustained, multi-domain approach, indirect methods, and deliberate ambiguity about their aims and sponsorship. Factors to help determine if an activity is part of a gray zone campaign include the following:

- Conducted by or on behalf of one *state* against another *state* or against a multilateral institution
- Intended to remain below the threshold of sustained combat, both in action and reaction
- Intended to advance a political or security goal, such as to weaken or change a foreign government; *coerce* a change of behavior; challenge or assert sovereignty or effective control over territory or a global domain, seize sovereign economic resources; or gain an advantageous position for future *armed conflict*
- Intended to achieve physical or material effects or a substantial change in the political status quo; and
- Actor knowingly violates *international law* or *international norms* of state-to-state relations or exploits their absence.

Gray Zone Activity ● A *coercive* or *subversive* action that, when conducted by or on behalf of a *state* outside of *armed conflict*, violates *international norms* or exploits their ambiguity or absence. Similar activities may be conducted by *non-state actors*, by *state* actors in wartime, or by *state* actors in isolated incidents not intended to *coerce* or *subvert* other *states*. The following is a list of activities by domain that may be considered gray zone activities—depending on context.

Alternative terms: “gray zone method,” “gray zone tactic,” “gray zone operation,” “gray zone tool,” “gray zone pressure,” “gray zone coercion”

DOMAIN	POTENTIAL GRAY ZONE ACTIVITIES
Cyber	<p>Cyber Attack ▲ Actions taken in cyberspace to disrupt, deny access to, manipulate, degrade, or destroy computers, information systems or networks, physical or virtual systems controlled by computers, or information resident on or transiting any of the above.</p> <p>Alternative: “computer network attack”</p>
Economic	<p>The expropriation of sovereign resources, seizure of assets, or imposition of embargoes or sanctions to <i>coerce</i> a <i>state</i>, without approval from an international authority.</p> <p>Economic coercion ▲ Instances in which a <i>state</i>—including through its designees—uses, or threatens to use, trade and investment barriers or constraints to other forms of economic engagement to interfere with the legitimate sovereign choices of another government.</p> <p>Embargo (international). Preventing the lawful entry and/or exit of goods, services, investment, or information to or from another country without the use of armed force.</p> <p>Sanction (economic). An economic measure imposed by a country or group of countries against another country or a specific foreign government entity, non-state actor, or individual that restricts the target’s ability to engage in international trade or finance and that is intended to advance policy objectives distinct from trade retaliation.</p>

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 5 of 11

italics Word has its own entry in the lexicon ▲ Term and definition substantively copied from another US Government lexicon or international law ● Term in Public Law 117-103

DOMAIN	POTENTIAL GRAY ZONE ACTIVITIES
Information	<p>Foreign Malign Influence (FMI) ▲ <i>Subversive</i>, undeclared (including <i>covert</i> and <i>clandestine</i>), <i>coercive</i>, or criminal activities by foreign governments, <i>non-state actors</i>, or their <i>proxies</i> to affect another country's popular or political attitudes, perceptions, or behaviors to advance their interests. FMI can include efforts to sow division, undermine democratic processes and institutions, or steer policy decisions in favor of the foreign actor's objectives.</p>
Legal	<p>Arbitrary Detention ▲ Holding a foreign national solely or substantially to influence another state's policy or to secure concessions, including through spurious charges or disproportionate sentencing for criminal offenses. The US Secretary of State may designate cases of wrongful detention that meet specific policy and legal criteria.</p> <p>Lawfare. The willful exploitation or manipulation of <i>international law</i>, international organizations, or domestic law to delegitimize another state or prevent it from achieving its international military or political objectives, such as spurious accusations of war crimes or appeals for intervention to international judicial organizations such as the UN or the International Criminal Court.</p> <p>Weaponized International Migration. The intentional manipulation of migrant flows to <i>coerce</i> another state.</p>
Military and Security	<p>Provocations; supporting armed proxies—including <i>insurgencies</i>, <i>terrorist groups</i>, or other states—and <i>covert</i> action such as sabotage, assassination, or other <i>lethal</i>, <i>kinetic</i>, and non-lethal attacks on foreign nationals or assets, including through the use of chemical, biological, or radiological agents.</p> <p>Assassination ● The targeted extrajudicial killing of an individual for political or ideological purposes, excluding attacks on individuals who are legitimate military targets.</p> <p>Electromagnetic Attack ▲ The use of electromagnetic energy, directed energy, or antiradiation devices to attack personnel, facilities, or equipment with the intent of degrading, neutralizing, or destroying the target's capability. Electromagnetic attacks may include <i>reversible</i> effects such as jamming or blinding and <i>irreversible</i> effects on targets. Similar effects also may be sought using other energy forms, such as acoustic energy.</p> <p>Provocation (military) ● An operation by a country's <i>armed forces</i> whose primary purpose is to elicit a response from another country, generate a sense of threat, or challenge control over an area. Provocations may be distinguished from <i>exercises</i> by their primary intended purpose, which is to elicit a response rather than to support force development.</p> <p>Proxy ● An entity that acts, at least in part, on behalf of a foreign country or non-state sponsor or receives support from that sponsor to pursue a political and military objective. A proxy conflict is an <i>armed conflict</i> in which an external power or sponsor—known as the principal—indirectly engages by supporting one of the local combatants—known as the proxy.</p> <p>Sabotage ▲ Action taken with the intent to cause defective production or damage to critical infrastructure or national defense materials.</p>
Space	<p><i>Kinetic</i>, <i>non-reversible</i>, or <i>reversible</i> attacks on terrestrial and on-orbit space assets.</p> <p>Rendezvous and Proximity Operation (RPO) ▲ On-orbit space activity wherein a resident space object is intentionally brought close to another—rendezvous—and maintains a close distance for a specific purpose.</p>

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 6 of 11

<i>italics</i>	Word has its own entry in the lexicon	▲	Term and definition substantively copied from another US Government lexicon or international law	●	Term in Public Law 117-103
----------------	---------------------------------------	---	--	---	----------------------------

ASSOCIATED TERMS

Adversary (foreign) ▲ A country specified in section 4872(d)(2) of title 10, United States Code.

Aggression ▲ The use of *armed force* by a *state* against the sovereignty, territorial integrity, or political independence of another state, or in any other manner inconsistent with the charter of the UN.

Alternative: “armed attack”

Alliance. A formal partnership between two or more states in which parties pledge to actively defend or *militarily support* other parties under certain circumstances, usually involving *aggression* by a third country or non-state actor. The **US Alliance System** is network of bilateral and multilateral treaties established since 1945 to provide for collective defense and global stability, including currently active bilateral or trilateral treaties with Australia and New Zealand, Japan, the Philippines, South Korea, and Thailand; NATO Allies; and the Inter-American Treaty of Reciprocal Assistance.

Alternative: “mutual defense treaty” or “collective defense treaty”.

Armed Conflict ▲ Protracted confrontation involving the widespread use of *kinetic* or *lethal* force between the *armed forces* of two or more *states*—known as an international armed conflict—or between the *armed forces* of a *state* and unofficial *militias* or *paramilitaries* or between such unofficial forces within the territory of a *state*—known as a non-international armed conflict.

Alternative: “war”

Armed Forces. A country’s national-level defense or security forces that are separate from law enforcement. This includes military services such as armies; navies; and air, cyber, and space forces, as well as others that may operate under military command during peacetime or war.

Attribution ● The identification of the actors responsible for conducting or sponsoring a *covert operation* or other unacknowledged activities such as *information operations*, including internal investigation and public or private messaging.

Clandestine (operation) ▲ Concealed, hidden, secret, or surreptitious operation intended to be conducted with no observable impact and without the knowledge of anyone but the organization conducting the operation or investigation.

Coercion ● The use or threatened use of force or the imposition of cost to induce a change of policy or leadership in another *state*, or to punish for past behavior.

Conflict (international). An enduring dispute or hostility between two or more *states* in which actors resort to means beyond diplomacy or *trade retaliation* to achieve objectives at the others’ expense, in some cases including *armed conflict*.

Covert (operation) ▲ ● An operation that is planned and executed so as to conceal the identity of, or permit plausible denial by, the sponsor, including to the target, the sponsoring country’s public, or third parties. This is contrasted with an **open operation** or **overt operation**, which a *state* acknowledges as conducted by its government or on its behalf. The sponsor of a covert operation may expect the effects to be *detectible* but not *attributed*.

Alternative: “deniable operation”

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 7 of 11

<i>italics</i>	Word has its own entry in the lexicon	▲	Term and definition substantively copied from another US Government lexicon or international law	●	Term in Public Law 117-103
----------------	---------------------------------------	---	--	---	----------------------------

ASSOCIATED TERMS (*continued*)

Cyber Operation ● An umbrella term to describe activities to achieve objectives on information systems, networks, or devices, including cyber attacks, cyber espionage, cyber-enabled influence operations, and cyber defense.

Detectible (operation) ● An activity—such as an *information operation*, *clandestine operation*, or *covert operation*—whose existence may be conclusively established even if *attribution* of its executor or sponsor is not possible.

Espionage ▲ Intelligence activity directed toward the acquisition of national security-related information through clandestine means and proscribed by the laws of the country against which it is committed. Espionage conducted in cyberspace does not affect the integrity or availability of the targeted network's data.

Exercise (military) ▲ A military maneuver or simulated wartime operation involving planning, preparation, and execution that is carried out for the purpose of training and evaluation. Military exercises sometimes have a secondary political purpose, such as reassuring allies, signaling resolve or international unity, or deterring *aggression*.

Escalation ● Intensifying an operation or campaign to achieve greater effects, such as by increasing the frequency, duration, scale, destructiveness, visibility, or geographic dispersion of activities or commencing new ones.

Foreign Influence ▲ Efforts by a foreign actor to affect another country's popular or political attitudes, perceptions, or behaviors. This includes, but is not limited to, commercial activities, diplomacy, and lobbying.

Great Power. A state with the capacity to project power and influence events globally using a combination of geopolitical, diplomatic, economic, and military tools, such as a permanent seat on the UNSC, nuclear weapons, a large economy, and the ability to independently project military power globally.

Great Power Competition ● Efforts by *great powers* to increase their relative power and influence in the international system at the expense of other *great powers*.

Hybrid Warfare. The coordinated employment of *gray zone activities*, such as *covert action* or *foreign malign influence*, with conventional military operations to achieve common political-military campaign objectives.

Influence Operation ▲ An effort by a state, non-state actor, or proxy to affect another country's popular or political attitudes, perceptions, or behaviors, sometimes to achieve a specific goal under a larger influence campaign objective.

Information Operation ▲ ● The integrated employment of information-related capabilities to influence, corrupt, disrupt, or usurp the decisionmaking of a state or its population while protecting one's own information and decisionmaking. This may include *cyber operations*, *electromagnetic attacks*, or *influence operations*.

Insurgency ▲ A protracted political-military struggle directed toward subverting or displacing the legitimacy of a government or occupying power and controlling the population and resources of a territory through the use of irregular military forces and illegal political organizations. **Counterinsurgency** (COIN) is the combination of measures undertaken by a government to defeat an insurgency.

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 8 of 11

<i>italics</i>	Word has its own entry in the lexicon	▲	Term and definition substantively copied from another US Government lexicon or international law	●	Term in Public Law 117-103
----------------	---------------------------------------	---	--	---	----------------------------

ASSOCIATED TERMS (*continued*)

International Law. The rules, norms, and standards generally recognized as binding on the conduct of *states*. *States* adhere to the concepts of international law through treaties, custom, and interpretations by their domestic judiciaries and international tribunals.

Alternative terms: “international legal norms,” “customary international law,” “public international law,” or “law of nations”

International Norm ▲● Widely shared expectations about what constitutes appropriate behavior among *states* and certain *non-state actors* at the international level. Non-binding frameworks, such as voluntary codes of conduct or conventions, sometimes set the scene for more formal, binding agreements.

Irregular warfare ▲ A form of warfare where *states* and *non-state actors* campaign to assure or coerce *states* or other groups through indirect, non-attributable, or asymmetric activities.

Kinetic (force) ● An activity intended to produce physical effects in a target, including damage to military equipment or civilian infrastructure and bodily harm to persons, through the force of moving bodies or explosions. **Non-kinetic** force is intended to affect the functioning or decisionmaking of a target through physical action without causing significant damage or bodily harm.

Lethal (force) ▲● A degree of force that a reasonable person would consider likely to cause death or serious bodily harm. In the international context, lethal force may be applied by a state’s *armed forces*, other government agencies, *proxies*, or *non-state actors* against nationals or assets of another, and **lethal aid** is the transfer, from one *state* to another or to *proxies*, of weapons systems or munitions whose primary purpose is *kinetic* or lethal. **Non-lethal** force is that which the actor designs to avoid serious bodily harm to the target and other persons.

Militia ▲ A body of armed fighters representing specific ethnic, religious, tribal, clan, other communal and identity groups, or political parties. Militias may serve a government directly or indirectly, operate independently to combat other militias or insurgent groups, pursue criminal activity, or support an insurgency.

Military support. The coordinated or complementary maneuvering or employment of a *state’s armed forces* to deter, tie down, or target another country’s forces or territory in support of a partner.

Non-State Actor. An entity in international relations that is not a government. These may—for independent financial, ideological, or political reasons—act against or in support of *states* in the international system, such as by fighting as an insurgent or terrorist, working as a *state proxy*, furthering humanitarian causes, or conducting *cyber operations* or *influence operations*.

Paramilitary ▲ *Armed force* or group separate from the conventional military forces of a country but resembling them in organization, equipment, training, or mission. **Official paramilitaries** are acknowledged as parts of a *state’s* government and are therefore distinct from non-state paramilitaries such as *militias* and *private military and security companies*.

Private Military and Security Company ▲ A for-hire firm that provides military or security services, irrespective of how they define themselves. Some definitions distinguish private military companies (PMCs) from private security companies (PSCs) based on the types of missions they conduct, but most firms provide the same types of services most of the time.

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 9 of 11

<i>italics</i>	Word has its own entry in the lexicon	▲	Term and definition substantively copied from another US Government lexicon or international law	●	Term in Public Law 117-103
----------------	---------------------------------------	---	--	---	----------------------------

ASSOCIATED TERMS (*continued*)

Reversible (operation). An activity intended to temporarily disrupt the capacity or functioning of a target—such as a satellite, network, or military system—without causing permanent harm to the system.

Alternative: “non-destructive”

Sanctions Circumvention. When a sanctioned entity makes adjustments to the conduct of a transaction to complete the transaction without technically violating the sanctions. **Sanctions evasion** is a deliberate misrepresentation to hide the involvement of a sanctioned entity in a prohibited transaction.

Show of Force (military) ▲ An operation to demonstrate resolve that involves increased visibility of a country’s *armed forces* in an attempt to defuse a specific situation that, if allowed to continue, may be detrimental to its interests or objectives.

State ▲ A political entity in the international system that possesses a permanent population, a defined territory, a government, and the capacity to enter relations with other states. Some constructions of statehood also require the government to hold a monopoly on the use of violence within its borders and broad diplomatic recognition by other states or membership in the UN.

Alternative: “nation-state” or “country”

Statecraft. The exercise of one or more of the elements of *state* power by the sovereign authority of a country to achieve policy goals in the international system.

Subversion (political). Non-violent efforts to undermine the sovereignty of another *state* from within, such as by overthrowing its government or substantially changing its institutions, political system, leadership, or policy by means that are unlawful in that *state*.

Terrorism ▲ Premeditated, politically motivated violence perpetrated against noncombatant targets by subnational groups or clandestine agents. **Terrorist organizations** include groups designated as Foreign Terrorist Organizations or identified under Executive Order 13224 as Specially Designated Global Terrorists. State support to terrorism is a form of *proxy conflict* and may be active, such as providing sanctuary, resources, or political support, or passive, including providing a favorable environment for terrorist organizations through lax regulation or inconsistent enforcement.

Trade and Investment Barrier. A measure imposed by a government that impedes or prevents international trade or financial transactions for economic, national security, or political purposes, including tariffs and non-tariff barriers, export controls, investment restrictions, and capital controls.

Trade Retaliation. Measures taken by a *state* to respond to what it perceives as unfair or harmful economic practices by another *state* and to protect domestic industry or consumers, such as the imposition of tariffs, non-tariff barriers, or other *trade* and *investment barriers*.

Transnational Repression. Foreign governments’ transgression of *state* borders through physical and digital means to intimidate, silence, harass, harm, or forcefully repatriate members of diaspora or exile communities or other perceived regime opponents.

Unconventional Warfare ▲ Activities conducted to enable a resistance movement or insurgency to coerce, disrupt, or overthrow a government or occupying power by operating through or with an underground, auxiliary, and guerrilla force in a denied area.

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 10 of 11

Appendix A: Selected US Government and Academic Definitions of the Gray Zone

Public Law 117-103 states that “‘gray zone activity’ means an activity to advance the national interests of a State that—(i) falls between ordinary statecraft and open warfare; (ii) is carried out with an intent to maximize the advancement of interests of the state without provoking a kinetic military response by the United States; and (iii) falls on a spectrum that ranges from covert adversary operations, to detectible covert adversary operations, to unattributable adversary operations, to deniable adversary operations, to open adversary operations.” The **Intelligence Authorization Act for Fiscal Year 2023** further defines “a gray zone asset as an entity or proxy that is controlled, in whole or in part, by a foreign adversary of the United States and is used by such a foreign adversary in connection with a gray zone activity.”

The **Department of Defense’s** 2022 National Defense Strategy states that “Competitors now commonly seek adverse changes in the status quo by using gray zone methods—coercive means that may fall below perceived thresholds for US military action and across areas of responsibility of different parts of the US Government. Adversary gray zone campaigns often prioritize indirect, non-attributable, or deniable activities, as well as incremental coercive measures that are designed to achieve state objectives over time without ever triggering a decisive response from the target.”

The **Joint Staff’s** 2015 Strategic Multi-Layer Assessment defined the gray zone as “A conceptual space between peace and war, occurring when actors purposefully use multiple elements of power to achieve political-security objectives with activities that are ambiguous or cloud attribution and exceed the threshold of ordinary competition, yet fall below the level of large-scale direct military conflict, and threaten US and allied interests by challenging, undermining, or violating international customs, norms, or laws,” and the Joint Strategy Review report in the same year added that gray zone conflicts are “the purposeful, aggressive, ambiguous, and integrated use of multiple elements of power to achieve political or economic objectives, by a state or non-state actor, exceeding the threshold of normal competition yet falling below the level of major war.” **Special Operations Command** defined the gray zone as “competitive interactions among and within state and non-state actors that fall between the traditional war and peace duality.”

In 2017, a State Department **International Security Advisory Board (ISAB)** report on Gray Zone Conflict said “the term Gray Zone (“GZ”) denotes the use of techniques to achieve a nation’s goals and frustrate those of its rivals by employing instruments of power—often asymmetric and ambiguous in character—that are not a direct use of acknowledged regular military forces,” and discussed gray zone operations, campaigns, and techniques.

Updated IC Gray Zone Lexicon: Key Terms and Definitions

Page 11 of 11

Appendix A: Selected US Government and Academic Definitions of the Gray Zone

In 2019, **CSIS** defined gray zone challenges as “an effort or series of efforts intended to advance one’s security objectives at the expense of a rival using means beyond those associated with routine statecraft and below means associated with direct military conflict between rivals. When engaging in a gray zone approach, an actor seeks to avoid crossing a threshold that results in open war.” The same year, **RAND** said “The gray zone is an operational space between peace and war, involving coercive actions to change the status quo below a threshold that, in most cases, would prompt a conventional military response, often by blurring the line between military and nonmilitary actions and the attribution for events,” and **CNAS** in “defining gray zone conflicts” said “what is known as the ‘gray zone’ is a state between war and peace. Actors (state and non-state) who conduct gray zone activities seek to compel their opponents without requiring extensive or sustained military activity. In a gray zone conflict, the objective is not to defeat an enemy and control the territory once possessed, but to advance one’s own security interests at the expense of the rival.”

In 2022, the **Atlantic Council** said that “reaching consensus on such terminology is neither practical nor worth the effort beyond a common critical mass accomplished through working definitions versus absolute ones” but acknowledged that “definitions for the gray zone and hybrid conflict or warfare are critical for stakeholder synchronization.” It offered a working definition of the gray zone as “the space in which defensive and offensive activity occurs above the level of cooperation and below the threshold of armed conflict. Gray zone operations, activities, and actions (OAA) are often, but not always, clandestine, covert, unofficial, or outside accepted norms of behavior. Gray zone OAA are aimed at undermining the security of the target entity or projecting the national or organizational interest of the initiator but without triggering active armed conflict. While the gray zone can be thought of chronologically (i.e., after peace, before active hostilities), it is referred to spatially to reflect that this is not necessarily the case. In fact, gray zone activity can occur during active armed conflict between actors.”